RM-10352: Response to Comments of Grandmaison, W4VR (January 11, 2002)

W4VR wrote:

1. I would feel more comfortable if a petition requesting a major change to a domestic band allocation would have been filed by the ARRL with the support of its membership. As the petitioners indicate in their filing, there appears to have existed some disagreement between them and the ARRL on going beyond a voluntary band plan for 160 meters. I wish to note, and am certain the ARRL and FCC would agree, that band plans for 160 meters and other bands have worked very well for the amateur service where operators are self-regulating for the most part; therefore, I am not convinced that there is a need to impose further regulation on all radio amateurs by changing the allocation structure of 160 meters to satisfy the needs of a few DX operators.

Response of the Petitioners:

RM-10352 is completely consistent with the ARRL Bandplan in restricting wideband modes to 1843 and above, and there is no disagreement between the Petitioners and the ARRL on the need to separate modes. The ARRL Bandplan for 1.8 MHz may be found at Appendix 1 of our Petition, or

http://www.arrl.org/FandES/field/regulations/bandplan.html#160m

In addition, **all three IARU Regional Bandplans recommend that SSB be restricted to the general area of 1840 and above.** See http://www.iaru-r2.org/hf_e.htm.

The ARRL Bandplan Committee settled on 1843 for the lowest LSB carrier Frequency, to ensure that 3 kHz bandwidth LSB signals do not extend below 1840. Although some overseas stations may operate SSB below 1843, **most are in violation of the above IARU Regional Bandplan** for their region.

The issue at hand is compliance and enforcement. During ARRL Committee work, we discussed the need for segmentation of wideband and narrowband modes, as enjoyed on every other HF amateur band. However, our mandate from the ARRL Board of Directors was limited in scope to producing a recommendation for a revised 160M *Voluntary* Bandplan for the ARRL Board of Directors to evaluate. While some members of the Committee felt enforcement of the new bandplan would be a necessary next step, the Committee unanimously agreed that such action should be undertaken outside of the Committee's work.

After the Bandplan was adopted by ARRL in July, it became clear to Mr. Briggs K1ZM, and to me, that some amateurs would willfully violate the Bandplan, for whatever reasons. We thus submitted our Petition on September 10, 2001. Independently, on September 12, 2001, Mr. Riley Hollingsworth **sent three enforcement letters to amateurs for willfully violating the Bandplan**. While we applaud Mr. Hollingsworth's

actions, we remain concerned as to whether a voluntary bandplan will remain viable without the full force of a regulatory allocation. While we heartily applaud the tradition of self-regulation in amateur radio, we believe that applying a bandplan by regulation at 1.8 MHz represents a *de minimis* derogation of that tradition, because it is completely consistent with the existing regulatory control of modes on **every other HF amateur band**.

W4VR wrote:
2. In additional comments filed by the petitioners, there is new light shed on the fact that SSB operators would have to resort to "split-frequency" operation at times when the SSB DX stations are operating in the 1800-1843 kHz portion of the band. The problem with split operation is that the DX station can not always hear the weaker stateside SSB signals on its listening frequency and unintentional interference results on domestic QSO's taking place higher in the band. The 40 meter band is a good example of this where in recent months the FCC has cited several domestic DX operators for working split frequency operation on top of existing QSO's. The better solution is to allow domestic SSB operators to be on the same channel as the DX station to reduce unintentional interference on the upper portion of the SSB band, as is currently the case on 160 during CW and SSB contests which are scheduled at different times of the year. I also note that when these contests do take place, by gentlemen's agreement nearly the entire band is consumed by SSB or CW to allow a maximum number of operators on the band.

Response of the Petitioners:

With respect to split frequency operation, the experience at 3.8 MHz is informative. Given weak signals on a congested band, it is now well established on 75 meters that the most effective method for making intercontinental contacts is split frequency operation. It is, however, always true that it is the obligation of each operator to avoid interfering with an established contact when operating split **on any band**. With modest care, and the use of modern equipment (widely available since the 1960's), it is easy to avoid transmitting "on top of" an existing contact. This proposal puts no greater burden on the amateur bands than already exists on the 3.8 and 7.0 MHz amateur bands, while increasing the ease of intercontinental contacts.

Contests are another issue entirely. Put it simply, SSB contests consume 100% of the CW band below 1843, but CW contests consume only a small part of the SSB band above 1843. **During an SSB contest, there is literally no place for a CW operator to escape SSB interference** in the usual CW band below 1843.

W4VR wrote:
3. Requesting an exclusive narrowband allocation at a time when Morse Code testing requirements in the amateur radio service have been relaxed both domestically and internationally does not appear justified. This relaxation, and possible future elimination of the Morse testing requirement, indicates that

future generations of amateur radio operators my no longer have a need for a CW allocation. The argument could be made, however, that other data modes may require a separate allocation in the future; but, as the petitioners state in their filing there is very little, if any, of this type of activity on 160 meters at this time.

Response of the Petitioners:

We are reminded that **CW is the original digital mode** and has been proven to be the most effective mode to communicate in the noise, interference and fading which are so characteristic of 1.8 MHz. Weak, narrowband signals are more easily copied because the narrow noise bandwidth of CW filters better rejects noise than is possible for wideband signals. Appendix 2 of RM-10352 documents the efficacy of CW versus SSB quite dramatically. Appendix 3 documents the growth of 160 activity over the past 20 years. The majority of DXpedition contacts on 1.8 MHz are on CW because of its effectiveness when compared to SSB. Many expeditions do not even attempt SSB on 1.8 MHz because it has proven ineffective for long-distance weak-signal work. We believe CW will continue to be the preferred mode for weak signal communications on 160 meters, whether for low power or DX work. While the new QRSS mode (~0.5 WPM CW) may be an interesting mode for beacons, it is not very practical for real time contacts, given its very slow speed and the QSB characteristics of 160. Due to its proven effectiveness, especially for weak signals, the Petitioners feel **CW and other narrowband modes deserve the same segmentation available on every other HF amateur band today**.

Sincerely,

William R. Tippett W4ZV